## Federal Defenders OF NEW YORK, INC.

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Southern District of New York Jennifer L. Brown Attorney-in-Charge

BY ECF

Honorable Alison J. Nathan United States District Court Southern District of New York 40 Foley Square New York, New York 10007

Re: <u>United States v. Andrew Joyner</u>, 20 Cr. 505 (AJN)

**AUSA Andrew Rohrbach** 

Dear Judge Nathan:

Cc:

February 18, 2022

A change-of-plea conference is scheduled for Monday, February 28, 2022 at 3:00 PM.

The Court finds that the interests of justice served by granting an exclusion from the speedy trial computations from today's date through February 28, 2022 outweigh the interests of the public and the Defendant in a speedy trial in order to allow the parties to continue their discussions towards a pre-trial disposition of this case.

I write to provide the Court with a status update regarding a pre-trial resolution to the above-captioned case. The parties have finalized the terms of a written plea agreement to a violation of 18 U.S.C. § 924(c)(1)(A)(i) in satisfaction of the indictment and request that the Court set a date as soon as possible, but not February 24, 2022, for a change-of-plea conference. The parties agree that the SO ORDERED additional period of delay between February 18, 2022 and the change-of-plea conference is excludable under 18 U.S.C. § 3161(h)(7)(A) because such delay is necessary to effectuate the parties' negotiated pre-trial resolution.

2/22/2022

Respectfully Submitted,

Andrew J. Dalack, Esq. Assistant Federal Defender

Counsel for the Government Counsel for Andrew Joyner